



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JAMES E. JOHNSON
Corporation Counsel

JOSHUA J. LAX
Senior Counsel
jlax@law.nyc.gov
(212) 356-3538 (tel.)
(212) 356-3539 (fax)

April 24, 2020

BY ECF

Honorable Peggy Kuo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Danielle Rosenfeld, et. ano. v. Tara Lenich, et al., 18 CV 6720 (NGG) (PK)

Your Honor:

I am an attorney in the office of James E. Johnson, Corporation Counsel of the City of New York, counsel for defendants City of New York, Kings County District Attorney Eric Gonzalez, Lu-Shawn Thompson as administrator of the Estate of Kenneth Thompson, Mark Feldman, William Schaefer, Brian Donohue, William Power, Michael Dowling, Joseph Piraino and Robert Kenavan (collectively, "City defendants") in the above-referenced matters. I write jointly with plaintiffs' counsel, Samuel Shapiro, Esq., to respectfully request a thirty day extension from April 29, 2020 to May 29, 2020 for the parties to submit a proposed settlement in the above-referenced matter for approval from the District Court. The basis for this request is that the parties continue to discuss and attempt to resolve a number of terms related to the settlement of this class action on a range of issues including the identification of class members, notice provisions, and other significant issues. The parties have exchanged drafts, comments, and questions, but need additional time to review and formulate proposals, as well as address the forms used for notice to class members and the making of claims. The parties have made progress and are hopeful that an agreement can be finalized by the end of May. For these reasons the parties respectfully request a thirty day extension of time in which to submit an agreement for preliminary approval.

The parties thank the Court for its consideration of this application.

Respectfully submitted,

/s/

Joshua J. Lax
Senior Counsel
Special Federal Litigation Division

cc: All counsel (**By ECF**)